

June 6, 2014

**BY ELECTRONIC POSTING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Subject: Planet Labs Inc. Notice of Launch and Operation of Satellite System  
Authorization to Launch and Operate a Remote-Sensing Satellite System  
File No. SAT-LOA-20130626-00087, Call Sign S2912

Dear Ms. Dortch:

Planet Labs Inc. (“Planet Labs”), pursuant to Section 25.164 of the Commission’s Rules, hereby notifies the Commission that it has met the fourth and fifth milestones set forth in the authorization released on December 03, 2013.<sup>1</sup> In the *Planet Labs Grant*, the Commission granted Planet Labs authority to construct, launch, and operate a non-geostationary-orbit (“NGSO”) satellite system consisting of twenty eight (28) Earth Exploration Satellite Service (“EESS”) spacecraft – collectively known as Flock 1 – that will operate in the 8025-8400 MHz frequency bands and receive command signals in the 2025-2110 MHz band. Planet Labs is also authorized to use the 401-402 MHz and 449.75-450.25 MHz bands for early-phase and emergency-backup telemetry, tracking, and command operation.

Planet Labs successfully launched all twenty eight (28) satellites aboard an Antares rocket on January 9, 2014. The satellites were temporarily stowed aboard the International Space Station (ISS), until the first two satellites were deployed from the ISS into the intended orbit on February 11, 2014. The rest of the satellites were gradually deployed from the ISS throughout the month of February until the final two were deployed on February 28, 2014. By February 28, 2014, all twenty eight (28) satellites of the licensed system were successfully brought into service. In support of this statement, please see the attached letter of certification issued by the launch integrator, NanoRacks LLC.

It is hereby confirmed that the operation of the Planet Labs satellites fully conformed to the terms and conditions of the underlying authorization, as of February 28, 2014, and continues to conform to those terms and conditions. Accordingly, Planet Labs respectfully requests that the International Bureau issue a determination that Planet Labs has satisfied the fourth and fifth milestones requirement imposed in the *Planet Labs Grant*. This determination will allow Planet Labs to certify it has fully satisfied its milestone obligations and will be entitled to remove the remaining bond obligation (which currently stands at \$2,000,000). See 47 C.F.R. § 25.165(d).

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<sup>1</sup> *Planet Labs Inc.*, Stamp Grant in File No. SAT-LOA-20130626-00087 (released December 03, 2013, “*Planet Labs Grant*”).

If you require additional information, please contact the undersigned by telephone at (415) 829-3313, or by email at [mike@planet.com](mailto:mike@planet.com).

Sincerely,

**PLANET LABS INC.**

By: s/ Michael Safyan  
Michael Safyan  
Regulatory Compliance  
Planet Labs Inc.

### **List of Attachments**

Attachment A	On-Orbit Deployment Certification for all twenty eight (28) Flock 1 satellites (3/3/2014)
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### On-Orbit Deployment Certification

To Whom It May Concern,

The following certifies the successful launch and deployment of the 28 Planet Labs Flock 1 satellites by NanoRacks from the International Space Station.

<b>Client</b>	Planet Labs
<b>ISS Visiting Vehicle</b>	Orbital Sciences, CRS-1
<b>Launch Date</b>	January 9, 2014
<b>Quantity</b>	<b>Deployment Dates</b>
1-14	February 11 - 15, 2014
15-28	February 25 - 28, 2014
<b>Total</b>	28

Certified by:

A handwritten signature in black ink, which appears to read "Christopher K. Cummins".

Christopher K. Cummins  
NanoRacks  
Chief Operations Officer  
Date: March 3, 2014